



Planning

A new way forward

A woman with a backpack is walking on a dirt path in a park-like setting. Other people are visible in the background, and there are buildings in the distance under a cloudy sky.

How the planning system can help
our health, nature and climate

What is planning for?

Our planning system should contain the tools we need to tackle the challenges of the 21st century

When it comes to where we live and work, the real challenge we face is providing places where people can lead happier, healthier lives and have more control over what happens in their communities.

The Government's Planning White Paper was on course to increase the threat to nature in England and do little to create better homes and communities for wildlife and people. It prioritised short-term, inappropriate development ahead of local housing need

and the natural environment.

The new Secretary of State for Levelling Up, Housing and Communities, Michael Gove MP, has pressed pause on the reforms – and

“We need a Planning Bill that helps to restore nature, can tackle the climate crisis, and supports people’s wellbeing.”

we're delighted. We need a new approach. We need a Planning Bill that prioritises people and wildlife – one that helps to restore nature, can tackle the climate crisis, and supports people's health and wellbeing.

As we emerge from the pandemic, the toll it has taken on people's mental and physical health is becoming clearer. Time and again people have told us that nature and accessible natural green spaces have given them so much during the pandemic. The Covid-19 crisis has shown what we truly value, which is why we need

to put them at the heart of our recovery.

Almost half the population say that they are spending more time outside than before the pandemic. More than 9 in 10 agree that green and natural spaces are good places for mental health and wellbeing.

We need to plan for nature's recovery, and level-up access to nature, in the same way that we plan for built development.

Our planning system should ensure we're fit for the future, with stronger protections for nature and a new Wildbelt designation to protect land where nature can recover, alongside a legally binding

target for access to nature.

By factoring this into the planning process up-front, we can secure better places for people to live and greater public confidence in new housing plans across the country.

Craig Bennett
Chief Executive,
The Wildlife
Trusts



Sarah Gaunt/Basingstoke Gazette

Contents

4 Our concerns

Where the Planning White Paper is falling short

8 What needs to happen

Planning should be at the heart of nature's recovery

11 Nature Recovery Strategies

The critical tool to inform how we plan all development

12 Protected for a reason

The case for continuing to safeguard species

14 Wildbelt

A designation that would restore ecosystems to benefit us all

18 Access for all

Nature has to be reconnected with the places we live in

20 More democracy

It's the only way to rebuild public trust in planning



Cover picture:
Trumpington Meadows
- a development of 1200
houses with recreated
grassland, wetland and
green infrastructure
Pic: Keith Heppell

The Planning White Paper - our concerns

The existing proposals will make a bad situation much worse

In Summer 2020, the Government published a Planning White Paper: *Planning for the Future*. The Prime Minister described its proposals as the most radical reforms to the planning system since the Second World War, and

made clear the intention to 'tear it down and start again'.

A successful planning system is crucial to helping build the homes we need, as well as securing the recovery of nature. And with nature now declining at a speed never previously seen, it is clear the

current planning system has flaws and needs updating.

But The Wildlife Trusts believe the proposed reforms will only make a bad situation much worse - failing nature, people, and local democracy. The next three pages explain why.

“The reforms will only fail nature, people, and local democracy.”

For years we have been building our way to disaster. It has to stop

CONCERN

1

Current problems will get worse

The reforms are highly likely to increase nature's decline and fail to contribute to combatting climate change

The Planning White Paper sets out a data-driven, strategic approach to zonal planning which fails to properly integrate nature and weakens the protections that are available under the current system.

It proposes that land will be allocated to one of three areas: Growth, Renewal, or Protected. None of these areas provides a mechanism to support nature's recovery. The Paper also provides little detail on how adaptation and mitigation to climate change will fit into the planning system. Even the Protected area is simply protection

as it is now - protection that can be overridden by sufficient economic interest. The space that nature needs to recover isn't considered. Without the adequate evidence and data required to plan these areas, this approach risks increasing the loss of nature.

A proposed streamlining of Environmental Impact Assessments (EIA) and changes to wildlife protections pose a further risk by letting developers off the hook. EIA and Strategic Environmental Assessment are vital tools to help decision makers understand the scale of damage a development might do, and what steps need to be taken to minimise it. 'Streamlining' this process could mean the impacts on nature are not fully assessed. Any changes must strengthen protections for nature, and be consulted on ahead of the publication of the Planning Bill to ensure the impacts on nature are fully understood. To minimise the amount that

developers need to do to ensure nature is not damaged, the Government are establishing 'Species Conservation Strategies' for endangered species. This could mean developers would no longer worry about protected species on development sites, but simply pay a contribution to the wider conservation of the species. This approach is yet to be proven successful and could further threaten our most vulnerable species.

Finally, a review of the schedules of the Wildlife and Countryside Act, which list species protected from various harms, including development, is underway. If endangered and threatened species are removed, developers will not have to survey their sites for these species and take measures to avoid, mitigate or compensate for harming them. Removing protection from species that are still declining will simply hasten their journey to becoming critically endangered.

Mountain hare
A cold-adapted heathland species, already threatened by climate change



Luke Massey/2020VISION

No longer protected?



Water vole
Number have declined hugely in recent decades

Terry Whittaker/2020VISION



Slow worm
Very vulnerable to predation by domestic cats

Bruce Shortland



Pine marten
Populations in England are fragmented and small

Terry Whittaker/2020VISION



Adder
Long-lived but very sensitive to habitat loss

Danny Green/2020VISION

CONCERN

2

Nature remains separate

The reforms in the Planning White Paper fail to integrate nature into people's lives

We know that people value living in places close to nature. Evidence shows that spending time in nature improves our mental and physical health.

Far from putting nature into people's lives, the Planning White Paper includes no suggestion of ensuring access to green spaces

in the 'Renewal' areas where people already live.

There are strong sustainable development reasons for targeting a large amount of new housing in the 'Renewal' areas, but this risks a direct loss of accessible nature-rich green space due to infilling and development on the edges of

towns and villages. Densification could increase pressure on existing sites and other indirect impacts on wildlife, unless new accessible green space is also provided.

Loss of green space will also reduce the ability of nature to help us adapt to climate change. Mitigation and adaption to climate change cannot just be allocated to specific zones; they need to be integrated across the planning system.

To create places where people can live and enjoy healthier lives, we need nature to be integrated into urban areas through innovative design and placemaking. This must ensure that there are enough green spaces for people to have proper access to nature.



Lyndsey Young

Every child has a right, and a biological need, to grow up with nature



Drone Motion Stock/Shutterstock

Increased pressure on green space is a familiar pattern across the UK

The right for people to comment on proposals goes back 70 years



Rupert Paul

CONCERN

3

Democracy suffers

The reforms in the Planning White Paper undermine the democratic process

For decades, The Wildlife Trusts have worked with national and local government, businesses and local communities to influence planning and development to achieve better outcomes for people and wildlife.

We welcome the intention to make it easier for people to get involved in planning to shape the places where they live and work. But we are concerned that the reforms might fail that intention. Instead they might undermine the democratic process and provide little opportunity to influence individual development proposals.

The chance to comment on specific development proposals as they pass through the planning system has been an essential way for people to have a voice when

developments could directly affect them. It is also a vital mechanism through which The Wildlife Trusts help to get the best possible outcomes for wildlife. The proposals remove some of the ways in which

people engage in the planning system.

For most development, there would be only one point at which people can have a say: during the preparation of the local plan.



Jim Asher/BBOWT

Calvert Jubilee nature reserve in Bucks was partly destroyed by HS2

What needs to happen?

We believe planning reform should consist of five actions. Over the next 14 pages we explain them

The English planning system has been in place for over 70 years. During this time, it has been tested and fine-tuned to meet many of the aims we need it to achieve. Where it has failed, it was often not the system itself but its use.

However, like any long-running system, it needs to be reviewed and updated. And it was never designed to tackle the climate and nature crises.

With nature now declining at a speed never previously seen and global temperatures continuing to rise, we need a planning system that enables us to live within our environmental limits.

The Dasgupta Review has made clear that if we continue with environmentally costly development, future generations will be picking up the bill.

Our planning system should deliver truly sustainable development. We need affordable and sustainable housing where people can enjoy the beauty of nature on their doorstep.



Published in February 2021, the Dasgupta Review showed that business as usual was over

Action 1

Put nature's recovery at the heart of the planning system

Decades of development and building of infrastructure, unsustainable farming practices and pollution have left the UK one of the most nature-depleted countries on the planet. With one in seven species at risk of extinction and 58% in decline, nature is undeniably in crisis.

To finally turn the tide on nature's decline, it's essential that we plan for its recovery.

The planning system should play a crucial role in achieving this – mapping out where nature still survives, and where it needs more space to recover through investment in a Nature Recovery Network. By avoiding damage to these critical places, we can make sure that as we build we can also leave nature in a better state than we found it.

There are already changes underway that can help this happen. The

Environment Bill includes a requirement for Local Nature Recovery Strategies (see over the page) to be prepared everywhere, and for some development to deliver a net gain for biodiversity. The Planning Bill needs to integrate these principles into planning law, so that they really work for nature.

Local Nature Recovery Strategies

The Planning Bill must make it a legal requirement for Local



“With the climate and nature crises, we need a planning system that enables us to live within our environmental limits.”

There is no reason why a kingfisher should not be an everyday sight

Planning Authorities to contribute to the implementation of Local Nature Recovery Strategies, and to act in accordance with them when making land use planning decisions, including when considering planning applications. The Local Nature Recovery

Strategy maps should be used to inform any zonal planning, helping to decide where planning areas are located. Nature should be integrated into all areas, protected where it already exists, and new sites created for nature's recovery. Local Nature Recovery Strategies

have the potential to play a vital role in planning the recovery of nature, as well as saving money for local authorities by helping

Action 1 continued over the page

Action 1 continued

to coordinate biodiversity net gain funds and avoiding costly conflicts. However, without a clear duty to use them, funding could be wasted in creating strategies that are then ignored in land-use planning decisions.

Truly sustainable development

All development should adhere to the mitigation hierarchy (see box on the right) and be required to

“All development must play a part in resolving the nature crisis. This needs urgent clarification in the Planning Bill.”

Large tracts of land, including this Peak District moorland, must be managed to absorb carbon, not emit it

deliver a net gain for biodiversity.

The Environment Bill will require Nationally Significant Infrastructure Projects (NSIPs) and all development for which planning permission is needed to apply Biodiversity Net Gain. This means improving biodiversity by at least 10%, and leaving nature in a better state than before.

Biodiversity Net Gain has the potential to be very beneficial for wildlife but there are exemption provisions and not all development is covered. It is unclear the extent to which net gain will be required on the increasing amount of development which is considered permitted development, and therefore does not need further planning permission. This urgently needs clarification in the Planning Bill. All development must play a part in resolving the nature crisis.

Mitigation hierarchy: the starting point for any development

If a development will badly harm biodiversity, it should move to a site with less harmful impacts, adequately mitigated if this is not possible, or, as a last resort, compensated. All development should deliver net gain.

1. AVOID

Prevent damage to biodiversity by locating developments in the right place and ensuring good early design.

2. MITIGATE

Minimise biodiversity loss, integrate new habitat into design, use best practice to reduce construction impacts.

3. COMPENSATE

As a last resort, compensate for the remaining impacts.

FOR ALL DEVELOPMENTS BIODIVERSITY NET GAIN

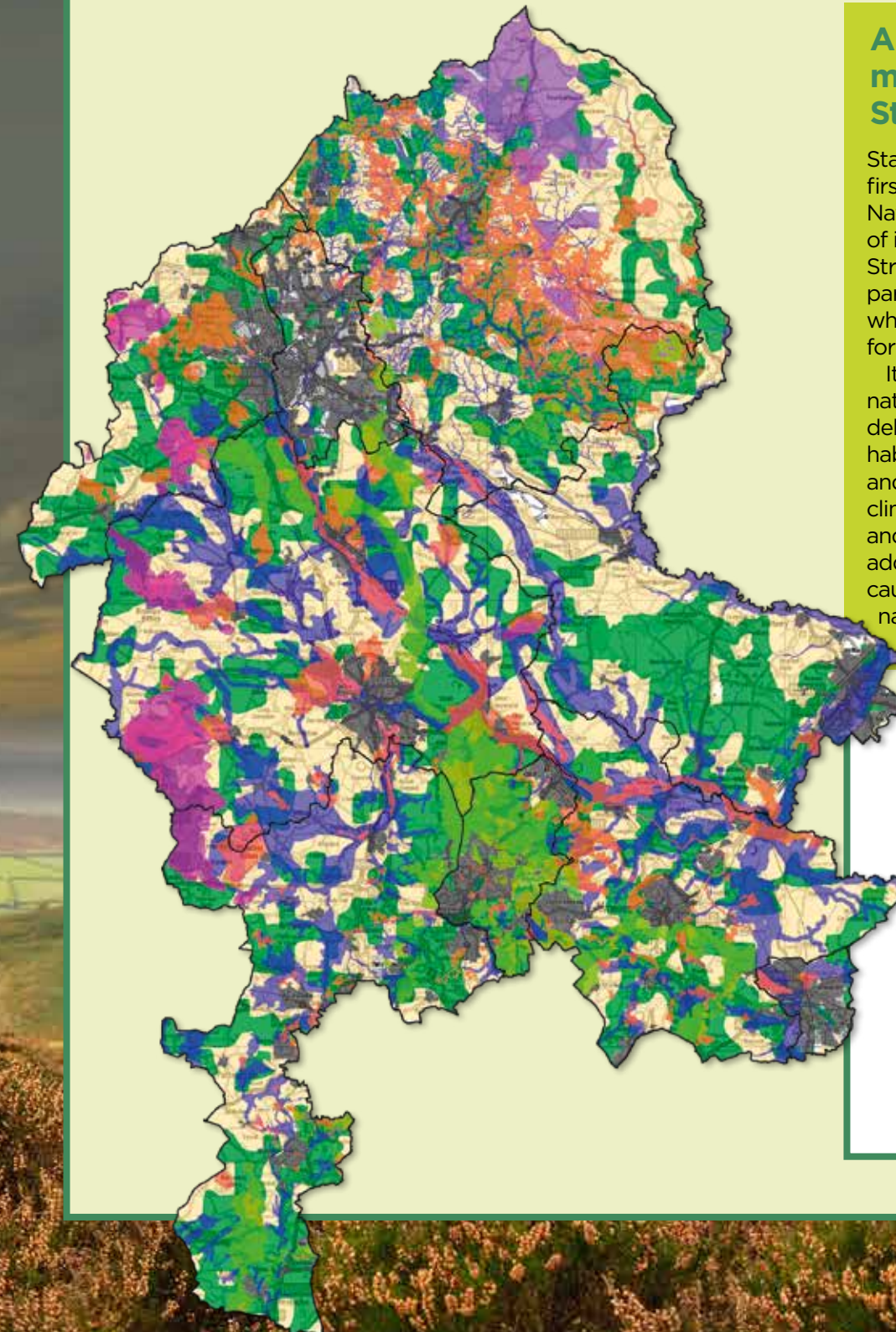
Net gain must be additional to steps 1-3, only used once the impacts have first been avoided, mitigated and compensated. All development must enhance biodiversity, even where no damage to nature occurs.

Local Nature Recovery Strategies: The critical planning tool

Local Nature Recovery Strategies will form the foundation for a Nature Recovery Network. They are to be developed in all areas, with local partners, to identify

what and where the priorities for nature are in that area. They are the means of translating national policy into local delivery, helping to target habitat creation for net

gain and natural solutions to climate change, and addressing the health inequalities stemming from lack of access to natural green space.



A nature recovery map for Staffordshire

Staffordshire is one of the first counties to produce a Nature Recovery Map, as part of its Nature Recovery Strategy. Developed by local partners, the map identifies what and where the priorities for nature are.

It is a means of translating national policy into local delivery. It helps target habitat creation for net gain, and natural solutions to climate change adaptation and mitigation. It also addresses health inequalities caused by lack of access to natural green space.

Key

Opportunity areas for joining up habitat

Heathland	
Wetland	
Urban	
Grassland	
Woodland	
Pasture & Arable	
Moorland	
Meres and Mosses	

Maintain existing protections

Nature protection policies and standards must not be weakened. If they are, they will simply accelerate nature's decline

When development does take place, it is vital that the impacts on nature are fully assessed, using accurate and robust information, so that it does not worsen nature's decline.

We currently have insufficient information to make reliable and evidenced decisions on the presence of habitats and species across any local authority. The proposals in the White Paper rely on an unrealistic assumption that there will be adequate environmental data, without further survey. Effective strategic planning requires a full programme of investment to establish high quality ecological data.

However, strategic data alone will not provide the site-level detail to enable impacts to be properly considered. Without accurate knowledge of the habitats and species on site, schemes such as Biodiversity Net Gain will not work.

The Planning Bill must, therefore, retain the requirement for ecological survey at the time an

individual development is put forward for planning permission.

The Government should maintain and strengthen sites (eg SSSIs, Local Wildlife Sites), and species protections in the planning system. Safeguards through the Wildlife & Countryside Act Schedules should be kept unless it can be demonstrated that species have reached favourable conservation status and no longer benefit from legal protection.

Alongside this, the process for Environmental Impact Assessments (EIAs) should be enhanced and consistently applied to all levels of decision making. To confront the scale of the crisis nature faces, EIAs should recognise impacts on locally important biodiversity; impacts on potential strategic opportunities for nature's recovery; and how the development will deliver a net gain for biodiversity.

Environmental data must also be improved so that we can properly assess impacts of Local Plans and the cumulative impacts of programmes of projects.

High quality ecological surveys, done at the right time of year, and early in a development's planning, are the only way to discover what the development impacts would be



“Without accurate knowledge of the habitats and species on site, schemes such as Biodiversity Net Gain will not work.”



Surveying for bats. Highly mobile wildlife is part of a site too

Tom Marshall

Chris Gomersall/2020VISION

Koniks at Wicken Fen, Cambs. Large areas of semi-natural habitat can be managed by large animals rather than machinery



Action 3

Introduce a new Wildbelt designation

We must identify 30% of land now to meet Government targets for 2030

Terry Whitaker/2020VISION

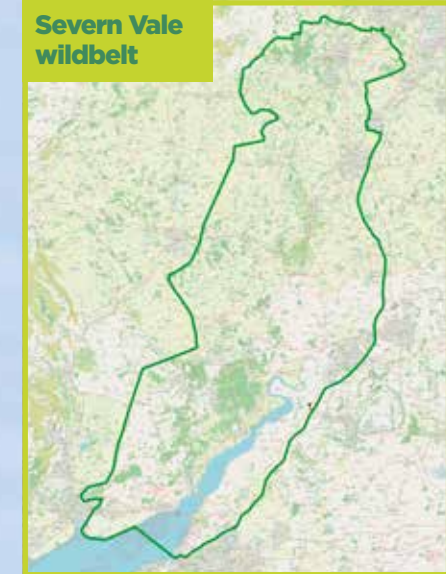
The Government has committed to protecting 30% of land for nature by 2030. This will require creation of significant new areas of habitat, through public and private investment, such as Biodiversity Net Gain and Environmental Land Management grants. Protecting these areas from damaging development in the future is an essential requirement for achieving the Government's ambition. These areas have little protection under existing designations. Though they are on a journey towards high biodiversity value, they do not yet meet any current criteria for protection from damage

“To give these sites a chance of contributing to nature’s recovery they must be protected now, rather than later.”

or loss. To give these sites a chance of contributing to nature’s recovery they must be protected now, rather than waiting until results have already been achieved. To secure the future of the land where we are making more space for nature, we need a new

designation. Wildbelt should be a robust and permanent designation that will protect land in the process of being managed to bring nature back, and speed up the creation of the Nature Recovery Network in England. Wildbelt proposals should be included in the forthcoming Green Paper on nature. Sites should be identified as part of the Local Nature Recovery Strategy process, with recommendations made to Defra for designation. The Planning Bill should require the recognition of Wildbelt sites in Local Plans, and the provision of policies in the National Planning Policy Framework that would set a presumption against development.

Wildbelt: What is it and how does it work?



The proposed Severn Vale Wildbelt spans Wales and England



English contributors Worcestershire (top) and Gloucestershire



Gloucestershire has already completed its Nature Recovery Map



Here is a detail from the map, close to the town of Tewksbury

For nature to start to recover, it needs a large land area which is allowed to function in a semi-natural way for the benefit of people and wildlife. Such wilder areas would provide us with ecosystem services: for example absorbing carbon, reducing flooding, providing cleaner water, boosting biodiversity and improving climate resilience. In a country as densely populated as England, nature’s recovery cannot be confined to remote uplands, but also where

“Allowing natural processes will provide social and economic benefits far into the future.”

people live. For example in the Severn Vale, this transformation (left) is centred on the river’s floodplain – an area where enormous transfers of energy and biomass take place. Allowing more natural processes there will provide ecological, social and economic benefits far into the future. Within such areas, the sites where nature is recovering should be protected from future destruction by being designated as Wildbelt.



Wildbelt means more natural features in a landscape, like this pond

Action 3 continued over the page

Billy Heaney

What's in a Wildbelt?

At Coombe Hill near Cheltenham, Gloucestershire Wildlife Trust is returning degraded farmland to a functioning wetland that stores carbon, purifies water and helps protect Gloucester against flooding

Flood prevention

"The whole system backs up from the Severn, so with rising sea levels Coombe Hill will get wetter and wetter for longer periods. With the nearby Ashleworth Ham reserve, it holds back water, helping protect Gloucester from flooding."

How to run a wetland

"The drains and scrapes are for wading birds; their populations are important for the Severn Vale. For the rest of the reserve we take a hay cut with aftermath grazing. But there's scope for a more sustainable system using No Fence collars on cattle."

And the benefits are:

"Locking up huge amounts of carbon; trapping sediment; purifying water; reducing the severity of flooding; improving biodiversity; and even providing climate control. Wetlands absorb a lot of heat to reduce the local temperature."

The fields that escaped the plough

"Unlike the land in the foreground, these fields (beyond the two pools to the hedge line) weren't ploughed up, so they have a greater diversity of wetland plants. We decided not to seed the ploughed land, but to let it come back naturally."

"We bought Coombe Hill Canal and Meadows in the 2000s," says Gloucestershire Wildlife Trust's Del Jones. Now the site could become part of the Severn Vale nature restoration

project (p15). "It's 105 hectares, and floods every year, usually in winter, up to a good two metres for two months. In the 1990s the previous owner tried and failed to grow linseed on it. For us it's a floodplain restoration project as well as a wetland."

What next?

"Coombe Hill is functionally connected to Ashleworth Ham, 2km away. There's scope to expand these reserves, and influence other land holders. It is vital to protect the investment we are making to restore nature, so that it can continue to provide these benefits for the future."

All this just a few hundred yards from the M5 motorway



This activity in this picture is not a luxury. It is a fundamental need

Action 4

Make nature available to everyone

Access to nature must be designed into every level of planning.

BCN Wildlife Trust

Evidence shows that access to good-quality green space is linked to improvements in both physical and mental health, as well as lower levels of obesity.

However, access for deprived areas, and for areas with higher proportions of minority ethnic groups, is deeply unequal. Currently, people who live in deprived areas are nine times less likely to have access to green spaces. To reduce health inequalities and relieve pressure on the NHS, our planning system must level up access to nature.

The Planning Bill must set a legally-binding target for access to nature, with all Local Planning Authorities being required to report progress towards this target annually. The target should not

simply be linear but take into account the way people can actually get to green space, avoiding barriers such as railway lines and major roads. It should include a measure of inclusivity – natural green space should be physically accessible and inclusive to everyone.

Planning should ensure people

“To reduce health inequalities and relieve pressure on the NHS, our planning system must level-up access to nature.”

live healthier and happier lives. This means integrating nature into all development zones and ensuring strategic plans consider the changing environmental factors that exacerbate health inequalities.

Indices of deprivation should include existing access to nature, flood risk and urban heat factors. This would allow Local Nature Recovery Strategies to spatially map and prioritise action to create space for nature, where it would also provide multiple benefits and help to tackle the impacts on communities of the climate, nature and health inequality crises.

Local plans and strategic health assessments must identify where access to nature is poor and take action to improve it, enabled through a planning system that works for both people and nature.

Nature: tackling the mental health pandemic



120mins

Spending at least two hours a week in nature is associated with good health and wellbeing.



3 times

People with easy access to nature are three times as likely to be active as those who do not have access.



Friendly

Research shows that street-level greenery improves residents' social interaction



20mins

Children exposed to green spaces for 20 minutes a day engage in five times more physical activity.



9 in 10

People agree that green and natural spaces should be good places for mental health and wellbeing.



46%

Almost half the population say that they are spending more time outside than before the COVID-19 pandemic.

Melinda Nagy/Shutterstock



The pandemic has taught everyone the value of green space

Improve community engagement

People must be able to engage with the planning system at the point where it is meaningful to them

Sufficient clear information must be available to ensure understanding of the impacts of development on nature and on local communities. It is vital that communities are made aware in consultations of all the issues and opportunities they face – including those linked to the climate and nature crises.

The Planning Bill must enable the public to support or challenge development when the actual proposals come forward, and their impacts become evident.

Local knowledge is invaluable. It can provide decision makers with information to understand the impacts and opportunities of the development for communities and the environment, as well as ensuring developments best suit the needs of local people and future communities.

The planning system should also retain independent examination of the Local Plan and the right for the public and other local stakeholders to be heard at the examination process. Self-assessment by Local Authorities would not give local people confidence that contentious issues had been fairly addressed.

There should be meaningful consultation on all aspects of planning reform, with Government prepared to act on the advice of all sectors and stakeholders.

“The Planning Bill must enable the public to challenge or support development when proposals come forward.”



Snuffing out the opportunity to protest against development will backfire

Ink Drop/Shutterstock

Good house, bad house

The average modern estate house should be better built, lower carbon and more wildlife friendly

Following the five actions set out in this report will give us a modern planning system that is fit for purpose. It will enable us to take great strides towards achieving our climate and biodiversity targets, whilst also facilitating the creation of vibrant community spaces and the building of much-needed homes for the future. But what should these homes look like?

“Developments must be consistently low carbon, nature-rich, resilient, healthy, well-designed and beautiful by 2025”.

Whether it's constructing new homes from scratch or retrofitting existing buildings, housing must reflect the 21st century challenges we are facing. House builders must pledge to deliver “places and developments that are consistently low carbon, nature-rich, resilient, healthy, well-designed and beautiful by 2025”.

This will mean ensuring that new homes are constructed using

durable materials that do not have high carbon or environmental footprints, such as reclaimed supplies and timber from sustainably managed forests.

Homes fit for the future will need to be extremely energy efficient, with excellent insulation, high-quality glass windows and rooftop solar panels where possible. Installing passive cooling features and making sure homes are well-

ventilated in the summer months will make them more resilient to our warming climate. Rainwater harvesting and sustainable urban drainage would also allow water to be managed more efficiently and could create additional habitats for wildlife.

Encouraging wildlife back into our neighbourhoods will bring multiple advantages, helping to deliver biodiversity net-gain and boosting

the health and wellbeing of residents. Designing bat roosts and bird boxes into buildings, installing green roofs and planting urban trees and hedgerows would go a long way in helping to provide quality homes for both people and wildlife.

For more information on how to build housing in a nature-friendly way, see UK Housing: Fit for the Future? wtru.st/3nObSHX

Less sustainable

More sustainable

1. Heat loss
Little or no insulation, or insulation carelessly installed, makes homes very leaky.

2. Poor quality windows
Cheap or hastily-fitted windows increase heat loss in winter and radiative heating in summer.

3. Lots of hard standing
Large areas of paving, Tarmac

and concrete leaves nowhere for heavy rain to go, increasing flood risk.

4. No thought for wildlife
Current housing estates create a net loss for nature rather than a net gain.

5. No natural spaces
Residents don't get the multiple benefits associated with time in nature.

1. Good use of roof space
Solar panels generate zero-carbon energy and green roofs benefit wildlife.

2. Rain capture
Rainwater harvesting allows more efficient use of water

3. Bird/bat bricks
Specially designed bricks provide homes for nesting birds and roosting bats

4. Excellent insulation
Well insulated windows and walls maximise energy efficiency

5. Passive cooling
Shading and convection systems keep homes cool in summer without power

6. Heat recovery
Ventilation with heat recovery technology

7. Wooden frames
Timber frames reduce the need for high embedded energy blockwork.

8. Heat pumps
Air source heat pumps provide efficient heating in a well-insulated house.

9. Sustainable drainage
Gutter-fed ponds and larger systems buffer the effects of

flooding and provide habitat for wildlife.

10. Green infrastructure
Trees and hedgerows provide habitat and help to reduce flood risk

11. Local wild space
Widespread studies show that easy access to wilder spaces improves people's physical and mental health.

2020 reborn/shutterstock

We need a Planning Bill that will ensure...



1 Nature's recovery is at the heart of the planning system

All development should contribute to nature's recovery. Local plans must include a plan for a Nature Recovery Network, integrating nature into all areas and identifying where nature should be protected, development avoided, and where new space for nature needs to be created.

2 Nature protection must be strengthened, not weakened

Assessments of environmental impact must take place before

development is permitted. All plans and proposals must be informed by robust, accurate, detailed and thorough ecological data.

3 A new designation, Wildbelt

This designation helps address the nature and climate crises by protecting land put into recovery for nature. This will ensure we can protect and manage at least 30% of land for nature by 2030.

4 Access to nature is designed into every community

Planning should enable the

development of great places for people to live and work. A legally binding target for access to nature would ensure everyone can receive the benefits nature provides, as well as addressing health inequalities.

5 People and local stakeholders can engage with the system

Local people can make their views heard at the point where it is meaningful to them, and sufficient, uncomplicated information is available so they can understand and respond to the impacts on nature and their local community.

Illustration: www.hilliard.design

Find out more about best planning practice

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